

**VAN BUREN COMMUNITY MENTAL HEALTH AUTHORITY  
POLICIES & PROCEDURES**

**Title:** Compliance Risk Assessment  
**Originated:** 02/09/10

**Number:** I.28  
**Approved By:** Executive Team

**POLICY:**

VBCMh will institute and enforce procedures to reasonably assure that VBCMh's Compliance Officer and Compliance Committee, and other VBCMh personnel as reasonably necessary to achieve the purpose of this policy, shall take such actions as will assure:

- Access to and familiarity with the latest HHS OIG's Compliance Guidelines and current Enforcement Priorities; and
- Responsible assessment of the baseline risk of any significant issues regarding non-compliance with laws or regulations in accordance with VBCMh's Compliance Plan.

It is also the policy of VBCMh that functional risk assessments should be performed annually as well as part of an ongoing process, and integrated into the daily operations of the organization.

**PROCEDURE:**

Regarding VBCMh's access to governmental risk guidelines and priorities, VBCMh's Corporate Compliance Officer (CCO), shall obtain, review, be familiar with, and make available copies or summary information regarding those risk areas identified by and included in official Compliance Program Guidance documents published by HHS OIG. The CCO shall also be familiar with, file and retain copies or appropriate summaries of any official OIG/Department of Justice, Internal Revenue Service, Occupational Safety and Health Administration, and other government publications of which the CCO is aware, in so far as such publications are relevant to operational or program risk areas identified by VBCMh's baseline risk assessment.

**VBCMh's Baseline Risk Assessment:**

- a. The procedures adopted for such assessment are to consist of ongoing processes and shall be compatible and not jeopardize the fiduciary duties of VBCMh's Board. Any officers or employees are to be aware of the operations for which they are responsible while protecting the organization against legal or other exposure that could jeopardize its ability to carry out VBCMh's mission and purposes. Accordingly, the scope of such baseline assessments shall not be over or under inclusive, violate confidentiality of the material generated during the assessment, or fail to incorporate the assessment findings into the compliance program.
- b. The CCO shall consult with legal counsel regarding potential confidentiality, legal or other liability risk issues upon reasonable suspicion of violations of any magnitude or sufficient scope or severity to place the organization in legal and/or financial jeopardy.
- c. Specific incidences of potential compliance violations will be handled in accordance with VBh's Compliance Investigation Policies and Procedures addressing initial inquiries and investigations.
- d. The baseline assessment shall be sufficient in scope to achieve the required awareness and shall include review of:
  - Previous internal and external audit reports;
  - Department written policies and procedures; and
  - Training course attendance records.
- e. Information obtained through risk assessment and/or monitoring should be retained in written form and disseminated or filed as appropriate and necessary.